

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON
CORPORATION'S MOTION TO IMPOUND THEIR MOTION TO COMPEL
SHAREHOLDER.COM TO PRODUCE THEIR
ARCHIVAL COPIES OF THE SHAREHOLDER MANAGEMENT SYSTEM**

Defendants CCBN.com, Inc. (“CCBN”) and The Thomson Corporation (“Thomson”) (collectively, “Defendants”) submit this Motion to Impound their Motion to Compel Shareholder.com to Produce Their Archival Copies of the Shareholder Management System (“Motion to Compel”). Impoundment is necessary because the Motion to Compel contains references to, and attaches copies of, documents produced by Defendants that have been designated as “Confidential” and “Highly Confidential” under the terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ Jennifer L. Chunias
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DATED: October 31, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Defendants conferred with counsel for Plaintiff and Defendant Robert Adler in a good faith effort. Counsel for Plaintiff and counsel for Defendant Robert Adler assent to the motion.

/s/ Jennifer L. Chunias

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